

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

Alex David Cook,)	Case No.: 3:10-CR-522
)	(3:14-CV-01455)
Defendant-Petitioner,)	
v.)	Judge James G. Carr
)	
United States of America,)	GOVERNMENT'S MOTION FOR AN
)	EXTENSION OF TIME TO FILE ITS
Respondent/Appellee.)	<u>RESPONSE TO 28 U.S.C. § 2255 MOTION</u>

Now comes the United States of America, by and through its attorney, Gene Crawford, Assistant United States Attorney, and in support of the government's request for a fourteen-day extension of time to respond to the petitioner Alex Cook, avers the following:

1. Petitioner Alex David Cook filed a motion to correct, set aside, or vacate sentence pursuant to 28 U.S.C. § 2255 on July 1, 2014. Petitioner's 51-page memorandum in support includes 18 separate claims of ineffective assistance of counsel. (Doc. 98 § 2255 Motion).

2. Currently, the government's response is due by September 2, 2014.

3. However, due to the press of business, the government has been unable to devote the proper attention to adequately research and respond to Petitioner's claims.

4. Accordingly, the United States requests a fourteen (14) day extension of time in which to file its response, until **September 16, 2014**.

5. This is the government's first request for an extension of time. This request is not sought for the purpose of delay.

6. Petitioner is presently incarcerated on a six-year sentence. Accordingly, he will not be

prejudiced by a fourteen-day delay.

WHEREFORE, Respondent United States of America, respectfully requests a fourteen (14) day extension of time from September 2, 2014 to **September 16, 2014**, in which to file its response in this case.

Respectfully submitted,

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UNITED STATES ATTORNEY

/s/ Gene Crawford
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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2014, the foregoing Motion for an Extension of Time was electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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s/ Gene Crawford
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